UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND - REGION I
1 CONGRESS STREET, SUITE 1100 (HBT)
BOSTON, MASSACHUSETTS 02114-2023

August 28, 2007

Orlando Monaco
Dept of the Navy, BRAC PMO Northeast
Code 5090 BPMO NE/LM, 4911 South Broad St
Philadelphia, PA 19112-1303

Re: Site 9 Neptune Drive Disposal Site, Monitoring Event 29 (September 2006) Report, dated July 2007, Naval Air Station Brunswick, Maine

Dear Mr. Monaco:

Pursuant to § 6 of the Naval Air Station Brunswick, Maine Federal Facility Agreement dated October 19, 1990, as amended (FFA), the Environmental Protection Agency has reviewed the subject document and comments are below.

General Comments

1. The September 2006 sampling (ME29) included only four (4) wells (MW-NASB-071, -072, -074, -075) sampled for VOCs and DRO while MW-NASB-076 was only sampled for DRO. This is not in accordance with the approved LTMP for this site. The text indicates that several wells have been decommissioned. However, the text does not indicate that these wells were agreed to be replaced once the removal action is completed. Please remove the portion of this sentence which states, "and are no longer monitored," and replace with, "and will be replaced after the removal action is completed."

2. It is not clear exactly how this impacted the sampling and analysis. Please add a table to the report showing which wells are stipulated for LTM sampling by the revised LTM Plan, dated October 2005, and, for each well, whether or not it was sampled. For those wells that were not sampled, please provide the reason (e.g., destroyed, inaccessible, frozen, etc.). (Note: the LTMP was revised in November 2006, however those revisions do not affect the wells to be sampled or gauged.) Please also add a table showing which wells are stipulated for water-level gauging, which were actually gauged, and, for those that were not gauged, the reason.

3. Water-level and analytical results reported in this document remain limited in their coverage due to the soil removal and associated decommissioning of wells in the central portion of the site and due to the Navy's disregard for the approved LTMP. The well that historically showed the highest vinyl chloride concentrations, MW-NASB-069, is among those destroyed and awaiting replacement. The trends shown in the figure on p. 2-2 should be viewed accordingly, as the set of wells on which they are based has changed.

4. Analytical results for ME29, although limited in coverage, are consistent with past results. VOC detections observed were for cis-1,2-DCE (2.7 ppb) and TCE (2.5 ppb) at MW-NASB-074; and trichlorofluoromethane (95.8 / 85.9 ppb) at MW-NASB-075. DROs were detected at MW-

NASB-072, -074, -075, and -076 at a maximum concentration (at -075) of 175J ppb.

Specific Comments

5. **p. 1-1, sec. 1.0:** Please note that the text refers to Figures 1-1 and 1-2, while the corresponding figures are labeled Figures 1 and 2. Please edit text or figure legends for consistency.

6. **p. 2-2, sec. 2.2.1:** It is noted that the plot showing total 1,2-DCE and VC trends, calculated by summing concentrations over all wells in the monitoring program, may be somewhat misleading with respect to the current round of sampling (ME29) and the previous two rounds. In particular, the highest CVOC concentrations historically were observed at MW-NASB-069, which was destroyed during the current soil removal at the site. Therefore, the ME29 results plotted here are not comparable to prior results that included this "hotspot" well. Total concentrations may or may not have dropped as suggested by the plot, if evaluated on a consistent basis.

7. **p. 3-1, sec. 3.1:** The third bullet notes that, "Concentrations of inorganics and semivolatile organic compounds are below applicable State MEG and Federal MCL guidance." This entry should be edited to reflect only results and interpretations for ME29 wells that were sampled not for the site in general. As written, it makes a statement about wells that no longer exist, and were not sampled in the event; no conclusions can be drawn concerning these wells. In addition, the statement concerning the wells that *were* sampled should be qualified to indicate clearly that the conclusions are limited by the limited availability of sampling points. When the wells (e.g., MW-NASB-069) are replaced, it will again be possible to assess the trends in the central, upgradient portion of the site.

8. **Appendix D:** The figures for trends in inorganics show concentrations of magnesium (see figures for MW-NASB-069, -070, and -079). For all three wells for which results are displayed, the most recent results are ND at a detection limit of 5 mg/L. Why is Mg of particular interest at the site? One disadvantage of displaying Mg on these plots is that, as a major element, concentrations (and detection limits) are expected to be high relative to other trace metals of interest (e.g., Cd, Cr), so that any detections of the latter may not be discernible on the plots because of the scale. It might be of greater value with respect to site water quality to plot manganese, which, historically, has shown exceedances of the secondary MCL (0.050 mg/L) and the Maine MEG (0.200 mg/L). Please consider displaying results for Mn rather than Mg in future reports.

If you have any questions with regard to this letter, please contact me at (617) 918-1384.

Sincerely,

Christine A.P. Williams, RPM
Federal Facilities Superfund Section

cc: Claudia Sait/ME DEP
G.Chris Evans/ME DEP e-mail only
Carolyn LePage/LePage Environmental
Dale Mosher/NASB
Ed Benedikt/BASCE e-mail only
Tom Fusco/BACSE e-mail only
Dawn Kincaid/BRAC PMO e-mail only
David Chipman/RAB e-mail only
Carol Warren/BLRA e-mail only
Charles Porfert/ EPA e-mail only
Peter Golonka/Gannet-Fleming e-mail only
Catherine Guido/ECC e-mail only
Al Easterday/ECC e-mail only
Jeff Donovan/ECC e-mail only
Gina Calderone/ECC e-mail only